

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:	:	BANKRUPTCY NO. 23-10255 JCM
	:	
DONALD KENNETH CHRISPEN, II AND	:	HONORABLE JOHN C. MELARAGNO
ACACIA TATE CHRISPEN,	:	
Debtors	:	CHAPTER 13
	:	
M&T BANK,	:	RELATED TO CLAIM NO. 3
Movant,	:	
	:	
v.	:	
	:	
DONALD KENNETH CHRISPEN, II AND	:	
ACACIA TATE CHRISPEN; and RONDA	:	
J. WINNECOUR, CHAPTER 13	:	
TRUSTEE,	:	
Respondents.	:	

DECLARATION REGARDING NOTICE OF MORTGAGE PAYMENT CHANGE
FILED IN COMPLIANCE WITH THE LOCAL RULES

I hereby certify as counsel for the Debtors that the existing Chapter 13 Plan is adequately funded and that there is no need to file an amended Chapter 13 Plan.

Respectfully submitted,

THE QUINN LAW FIRM

BY: /s/ Michael S. Jan Janin
Michael S. Jan Janin, Esquire
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Counsel for Debtors

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ACACIA TATE CHRISPEN,	:	
Debtors	:	CHAPTER 13
	:	
M&T BANK,	:	RELATED TO CLAIM NO. 3
Movant,	:	
	:	
v.	:	
	:	
DONALD KENNETH CHRISPEN, II AND	:	
ACACIA TATE CHRISPEN; and RONDA J.	:	
WINNECOUR, CHAPTER 13 TRUSTEE,	:	
Respondents.	:	
	:	

**CERTIFICATE OF SERVICE OF DECLARATION REGARDING
NOTICE OF MORTGAGE PAYMENT CHANGE**

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on October 28, 2024.

The type of service made on the parties was Electronic Notification via the CM/ECF System.

- Office of the United States Trustee at ustpreregion03.pi.ecf@usdoj.gov
- Ronda J. Winnecour at cmecf@chapter13trusteedpa.com
- Brian Nicholas on behalf of Creditor M&T BANK at bnicholas@kmlawgroup.com
- Denise Carlon on behalf of Creditor M&T BANK at dcarlon@kmlawgroup.com
- William E. Craig on behalf of Creditor ACAR Leasing Ltd. d/b/a GM Financial Leasing at wcraig@egalawfirm.com
- Brent J. Lemon on behalf of Creditor M&T BANK at blemon@kmlawgroup.com

Dated: October 28, 2024

Respectfully submitted,

THE QUINN LAW FIRM

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